

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of

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Docket Nos. 50-277  
50-278

PHILADELPHIA ELECTRIC COMPANY

SECOND AMENDMENT TO FEBRUARY 11, 1982

APPLICATION FOR AMENDMENT

OF

FACILITY OPERATING LICENSES

DPR-44 & DPR-56

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On February 11, 1982, Philadelphia Electric Company, Licensee under Facility Operating Licenses DPR-44 and DPR-56, filed an Application for Amendment of the Licenses which requested that the Technical Specifications contained in Appendix A of the Operating Licenses be amended by incorporating certain NUREG-0737 requirements.

Generic Letter No. 83-02, issued January 10, 1983, provided a Standard Technical Specification for certain NUREG-

Generic Letter No. 83-02, issued January 10, 1983, provided a Standard Technical Specification for certain NUREG-0737 requirements, including the overtime limits identified in NUREG-0737, Item I.A.1.3. On August 24, 1983, Licensee amended its February 11, 1982, Application to conform to the guidance of this Standard Technical Specifications. The amended Application included the addition of overtime work restrictions for certain plant personnel. The second paragraph of the Standard Technical Specification was excluded from the overtime work restriction proposed in the amended Application. The reason for its exclusion was to avoid the use of non-explicit terminology such as "routine heavy use", "objective", "unforeseen", and "substantial".

Subsequently, the NRC staff reviewing the Application requested incorporation of this paragraph into the Technical Specifications. Accordingly, Licensee hereby further amends its Application of February 11, 1982, as amended August 24, 1983, by deleting the proposed revised Technical Specification page 265 referred to in the August 24, 1983 Amended Application and substituting therefore updated page 268. The Bases on page 266 are unchanged and page 266 is resubmitted as page 269. The changes in page numbers reflect a redistribution of material resulting from Amendments No. 102 and 104, for Units 2 and 3, respectively, issued August 3, 1984.

The amendment Application incorporates the second paragraph of the Standard Technical Specifications previously

referenced with some minor editorial changes and a clarification that acknowledges the presence of two units at Peach Bottom. A minor revision to Specification 6.19.1 provides additional clarification regarding the titles of personnel covered by these specifications. Additionally, an editorial change is requested to Specification 6.19.2.c. Finally, a change is requested to Specification 6.19.3 to permit deviations from the overtime limits to be authorized by a senior staff member. This would permit the delegation of this authority by the employing officer to the senior staff member responsible for the supervision of the group in which a deviation from the overtime limits is requested. In this manner, the administrative burden would be distributed among several members of the station management. Monthly review of the deviations will be limited to the employing officer or his designee.

As stated in the August 24, 1983 Application, the current Peach Bottom overtime policy regarding shift operating personnel and health physics-chemistry technicians complies with the four overtime guidelines specified in the most recent NRC criteria. In correspondence dated September 20, 1985 (M. J. Cooney, PECO, to H. L. Thompson, Jr., NRC), Licensee expanded the commitment regarding the four overtime guidelines to include key maintenance, construction, and testing personnel. However, some minor deviations exist between the administrative provisions of Specification 6.19.3 and the previous commitments. For this reason and to reflect the additional guidance incorporated into

Specification 6.19.2, Licensee proposes that the overtime specification take effect three months from the issuance date of the License Amendment to provide sufficient time for the development of the necessary administrative controls and procedures.

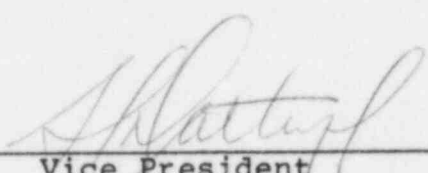
#### Significant Hazards Consideration Determination

This Application, as amended, does not reduce the requirements of the current Technical Specifications. The proposed change constitutes additional administrative controls not presently included in the Technical Specifications, and is in the interest of enhancing safe operations and complying with the requirements of NUREG-0737. The Commission has provided guidance concerning the application of the standards for determining whether license amendments involve no significant hazards considerations by providing certain examples (48 FR 14870). One of the examples (ii) of actions involving no significant hazards consideration is a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications. The change proposed by this application fits this example of an action not involving a significant hazards consideration. The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated since the proposed overtime limits are intended to reduce personnel fatigue and consequently improve their attentiveness to safety-related activities in the

interest of reducing the probability or consequences of an accident. For the same reason, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated. The changes do not involve a significant reduction in the margin of safety since they reduce the possibility of personnel error in activities related to nuclear safety.

The Plant Operating Review Committee and the Nuclear Review Board have reviewed the proposed changes to the Technical Specifications, and have concluded that they do not involve an unreviewed safety question or a significant hazards consideration, and will not endanger the health and safety of the public.

Respectfully submitted,  
PHILADELPHIA ELECTRIC COMPANY



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Vice President

COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF PHILADELPHIA :

S. L. Daltroff, being first duly sworn, deposes and  
says:

That he is Vice President of Philadelphia  
Electric Company, the Applicant herein; that he has read the  
foregoing Application for Amendment of Facility Operating  
Licenses and knows the contents thereof; and that the statements  
and matters set forth therein are true and correct to the best of  
his knowledge, information and belief.



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Subscribed and sworn to  
before me this 1<sup>st</sup> day  
of November 1985

Patricia D. Scholl

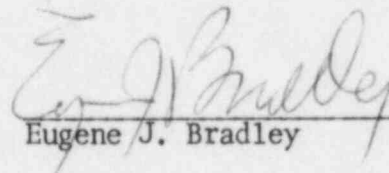
Notary Public

PATRICIA D. SCHOLL  
Notary Public, Philadelphia, Philadelphia Co.  
My Commission Expires February 10, 1986



CERTIFICATE OF SERVICE

I certify that service of the foregoing Second Amendment was made upon the Commonwealth of Pennsylvania, by mailing a copy thereof, via first-class mail, to Thomas R. Gerusky, Director, Bureau of Radiological Protection, P. O. Box 2063, Harrisburg, PA 17120; all this 1st day of November, 1985.

A handwritten signature in cursive script, appearing to read "E. J. Bradley", is written over a horizontal line.

Eugene J. Bradley

Attorney for  
Philadelphia Electric Company